

Exhibit 18



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Via E-Mail

John M. Hogan
Technology and Financial Services Section
U.S. Department of Justice
450 5th St. NW
Washington, DC 20530

January 28, 2021

Re: Civil Investigative Demand 30471-- Preservation and Production of Electronically Stored Information

Dear John,

On behalf of Alphabet, Inc. ("Company"), we respond to your letter dated December 23, 2020 regarding the preservation and production of electronically stored information (ESI). Since the Division first issued CIDs in fall 2019, the Company's outside counsel have explained the Company's preservation and production policies at several points in discussions with the Division, including in the Company's November 20, 2019 detailed response to the ESI Questionnaire. The Company is cognizant of its preservation obligations and confirms that it has preserved potentially responsive documents and other materials to the CID. In response to the specific items listed in your letter, we can provide the following information:

- (1) **The dates when employees received instructions to preserve such materials:** The Group A, B and C custodians received instructions around the time they were negotiated by the Company and the Division.



- (2) **Any steps taken by the Company to protect or preserve any employee's potentially responsive materials in the event a device is lost, stolen, upgraded, or otherwise unavailable:** The Company uses G Suite applications (Google Docs, Google Sheets, etc.) for general business purposes. The same G Suite applications are used on mobile devices and computers. G Suite documents are held in the cloud and the loss of a mobile device does not affect their status.
- (3) **For any such individual no longer employed by the Company, the steps taken by the Company to preserve any potentially responsive materials following separation:** Any employee on a legal hold remains on one after leaving the Company. All Google-owned devices are returned and preserved.
- (4) **Any steps taken by the Company to ensure employees comply with the preservation notice, including whether employees properly preserve responsive conversations from chats, instant messages, text messages, and other Messaging Applications as "on the record.":** The preservation notice instructs employees to retain all responsive information, whether that information is on Google applications like G Suite or third-party apps. For chats, employees are instructed to keep all potentially responsive conversations as "on the record," and are sent a reminder approximately every six months. Relevant "on the record" chats have been collected and produced as part of the Company's document productions.

The Company has already produced responsive information from Collaborative Work Environments (G Suite applications) and chats. Due to the Covid-19 pandemic, the Company is currently unable to gather mobile devices for collection of text messages. Once employees are back in offices (currently slated to be September 2021, which is subject to change based on public health conditions), the Company plans to collect, review and produce responsive material as soon as practicable. The Company expects to be able to produce material from text messages later in 2021.

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The Company requests confidential treatment of these materials to the fullest extent allowed by law, including the Antitrust Civil Process Act, 15 U.S.C. § 1311 et seq., Exemption 4 of the Freedom of Information Act, as well as all other applicable statutes, regulations, and customary confidentiality policies. The Company specifically requests advance notice before disclosure of any of these materials to any person and return or destruction of materials when the Department's investigation is completed.



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Confidential

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Please do not hesitate to contact me with any questions.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Julie Elmer'.

/s/Julie Elmer